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December 5, 2007

BY E-FILE

The Honorable Gregory M. Sleet
Chief Judge
United States District Court
for the District of Delaware
U.S. Courthouse
844 King Street
Wilmington, DE 19801

Re: Finjan Software Ltd. v. Secure Computing Corporation, et al.,
D. Del., C.A. No. 06-369-GMS

Dear Chief Judge Sleet:

In anticipation of the discovery teleconference scheduled for December 7, 2007 at 11:00 a.m. Eastern Time in the above-entitled matter, the parties jointly submit the following items to be presented to the Court:

Finjan's Issues:

- Prohibition of amendments to the Wallach report served 9 days after the deadline which added invalidity opinion regarding claims not identified in the initial report.
- Compelling supplementation of privilege log to provide details regarding email chains.
- Requesting an *in camera* review of allegedly privileged emails that were produced.

Secure Computing's Issues:

- Motion for continuance of trial by two weeks due to unavoidable conflict on Secure Computing's trial counsel's schedule due to trial in another case in Boston, MA.
- Motion to compel Finjan to produce non-privileged, responsive information from SAP accounting system, Salesforce.com, and Finjan budgets.
- Secure Computing's motion re: indefiniteness.

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Respectfully,

/s/ Philip A. Rovner
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cc: Frederick L. Cottrell, III, Esq. – by E-file and hand delivery
Christopher A. Seidl, Esq. – by E-mail